

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP

ALBERT INNARELLI, ET AL,
DEFENDANTS

**MOTION OF DEFENDANT MICHAEL BERGDOLL
TO MODIFY CONDITIONS OF RELEASE**

Now comes the defendant Michael Bergdoll and moves that the conditions of his pre-trial release restricting his travel to the Commonwealth of Massachusetts and the State of Connecticut be modified. The defendant seeks permission to travel to the Disney Animal Kingdom Resort, Orlando, Florida from August 11, 2005 to August 15, 2005 for the purpose of vacation with his wife and children. The telephone number at which the defendant may be reached during this time is 407-939-6244.

In addition the defendant also requests that he be permitted to travel to Hampton Beach, New Hampshire from September 9-12, 2005 for the purpose of a vacation with his wife and children. They will be staying at Ships Inn Resort, 15A Street, Hampton Beach, New Hampshire, tel. No. 877-744-7466.

Wherefore the defendant respectfully that the within motion be allowed.

The Defendant
Michael Bergdoll
By his attorney

/s/ Steven W. Leary
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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by mailing a copy of same, postage prepaid, to all attorneys of record.

August 3, 2005

/s/ Steven W. Leary
Steven W. Leary